

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Jennifer L. Seymour
419 Eastern Avenue
Newark, OH 43055

Case No. 2:18-mj-498

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/30/2018 in the county of Licking in the
Southern District of Ohio, the defendant(s) violated:*Code Section*

18 U.S.C. Section 2251(a)

Offense Description

Sexual Exploitation of a Minor (use of a minor engaged in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, utilizing materials that have been transported in interstate commerce).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT INCORPORATED HEREIN BY REFERENCE

☒ Continued on the attached sheet.*Complainant's signature*

Brett M. Peachey, FBI TFO

Printed name and title

Sworn to before me and signed in my presence.

Date:

June 29, 2018

City and state:

Columbus, Ohio*Judge's signature*

Kimberly A. Jolson, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of the Criminal Complaint:

United States of America

v.

**Jennifer L. Seymour
419 Eastern Avenue
Newark, OH 43055**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brett M. Peachey, a Task Force Officer with the Federal Bureau of Investigation ("FBI"), Columbus Resident Agency, being first duly sworn, hereby depose and state as follows:

1. I, TFO Brett Peachey (your affiant), make this affidavit in support of a criminal complaint to arrest for a violation of 18 U.S.C. § 2251(a) – Production of Child Pornography. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Jennifer L. SEYMOUR committed the violations listed above.

2. Your affiant has been employed as a police officer for the Westerville Police Department since December of 1995. Since March of 2008, your affiant has been assigned to the Child Exploitation Task Force with the Federal Bureau of Investigation, Cincinnati Division, Columbus Resident Agency, conducting online child enticement and child pornography investigations. Your affiant is also a member of the Franklin County Internet Crimes Against Children Task Force in Columbus, Ohio investigating similar crimes. Your affiant has gained experience through a Bachelor of Arts Degree in Criminology, and has received specialized training in the area of internet crimes involving child exploitation, child pornography investigations and computer forensics. Your affiant has been involved in hundreds of investigations involving internet crimes against children, resulting in dozens of felony arrests and convictions. As a Task Force Officer with the FBI, your affiant is authorized to investigate violations of the laws of the United States under the authority of the United States.

3. On or about April 30, 2018, Amber Blagg accessed the Facebook account of her sister, Jennifer SEYMOUR. According to Blagg she had the user name and password for Seymour's Facebook account and had logged into the account to see if Seymour and Blagg's ex-husband were communicating. While reviewing the account, Blagg saw that SEYMOUR had recently engaged in a Facebook messenger conversation with a subject with the user name "Leati Joseph Anoa'i." During this conversation, Anoa'i had requested that SEYMOUR take nude and sexually explicit photographs of her minor relative, hereinafter referred to as Jane Doe, who was born in 2014. Blagg saw that SEYMOUR had sent Anoa'i at least two photographs of Jane Doe in her underwear and seven photos of Jane Doe nude and/or explicitly displaying her genitals.

4. Blagg used her own cellular phone to take screen captures of the photos of the minor relative and portions of the conversation between SEYMOUR and Anoa'i and sent the screen captures to Jane Doe's parent, T.M. T.M. confronted SEYMOUR about the photos that evening and she eventually acknowledged that she had taken the photos of Jane Doe using her Motorola XT1765 cellular phone.

5. On May 1, 2018, T.M. took Jane Doe to Licking County Child Protective Services (CPS) and informed the agency of SEYMOUR's actions. Jane Doe was forensically interviewed by employees of CPS and said that SEYMOUR had taken nude pictures of her. CPS notified the Newark (OH) Police Department, and officers arrived at CPS offices and interviewed T.M. T.M. was in possession of both T.M.'s and SEYMOUR's cell phones and voluntarily turned them over to members of the Newark Police Department, signing a consent to search form for both phones.

6. Newark Police Officers reviewed the messages on T.M.'s phone that Blagg had sent, and observed the screen shots that Blagg had taken of SEYMOUR's Facebook account. The screen shots showed portions of a Facebook conversation between with the user name Leati Joseph Anoa'i, in which SEYMOUR and Anoa'i discussed sexual activities involving each other and Jane Doe. Anoa'i made sexually graphic comments and gave specific instructions regarding Jane Doe, including: "I want to fuck her tight little pussy with my big hard dick"; "I would tie ur daughter to the bed and then stick my big dick in her"; "u can take some pics, take the panties off and turn around and bend her over"" and "take 2 more pics of her pussy close up babe." The screen shots also showed the pictures that were sent to Anoa'i, which include the following:

- One image depicting Jane Doe standing nude with her legs slightly bent. Jane Doe's genitals are the center point of the photograph.
- One image depicting Jane Doe lying on her back nude with her legs spread wide.
- One image depicting Jane Doe nude from behind, while she is bent over with her hands on the floor.
- One image depicting Jane Doe nude from the chest down, with an adult's hand touching her vagina.

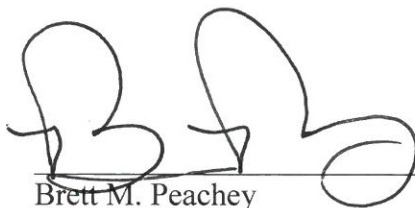
7. That same day, investigators travelled to SEYMOUR's residence to make contact with her. According to the investigators, when they initially made contact with SEYMOUR she immediately began to cry and stated that she was "sorry for the pictures." SEYMOUR agreed to accompany the investigators to the Newark Police Department to discuss the investigation. Once at the Newark Police Department, SEYMOUR was advised of her Miranda rights and agreed to be interviewed.

8. SEYMOUR admitted that she took both clothed and nude photographs of Jane Doe on April 30, 2018, and that she sent the photos to Anoa'i at his request through Facebook messenger. When she was asked whose hand was touching Jane Doe's vagina in the photograph described in Paragraph 6 above, SEYMOUR admitted that it was her hand. However, she claimed that she was only touching Jane Doe's vagina because she "had an itch." SEYMOUR also denied that she had told Jane Doe to remove her clothes, but admitted that she had asked Jane Doe to bend over for one of the pictures. When SEYMOUR was asked what Anoa'i was going to do with the photos of Jane Doe that she sent to him, she replied that he was going to "jerk off to them."

9. SEYMOUR advised that she deleted all of the photos that she had taken of Jane Doe the previous night from her phone.

10. Based upon the foregoing information, your affiant submits that there is probable cause to believe that Jennifer SEYMOUR persuaded, employed, used or coerced Jane Doe to engage in sexually explicit conduct, specifically, lascivious display of the genitalia, for the purpose of producing a visual depiction of such conduct, and such visual depictions were transmitted via Facebook, which is a means or facility of interstate or foreign commerce, and has thus committed

offenses in violation of 18 U.S.C. §§ 2251(a). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.



Brett M. Peachey
Task Force Officer
Federal Bureau of Investigation

Sworn to and subscribed before me this 29th day of June, 2018.


KIMBERLY A. JOLSON
UNITED STATES MAGISTRATE JUDGE
United States District Court for the Southern District of Ohio
